



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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**VIA ECF**

Honorable Valerie Figueredo  
United States Magistrate Judge  
Southern District of New York  
New York, NY 10007

Re: Crespo, et al. v. New York City, et al.,  
22-CV-7345 (PKC) (VF)

Your Honor:

I am a Senior Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney for defendant the City of New York. I write to request a second extension of time for defendant City to respond to plaintiff's letter motion to Compel certain documents, from January 21, 2025 until January 31, 2025. Plaintiffs' counsel and co-defendants counsel do not object to this request.

Plaintiffs previously moved to compel certain documents in this matter in November of this year. Defendant City requested a brief extension of time to respond. The Court granted the extension and moved the deadline to January 21, 2025 and set the conference for January 28<sup>th</sup>, 2025. On January 7, 2025, defendant City requested that the conference be adjourned as defense counsel will be out of town from January 21 through January 28<sup>th</sup>. In response, the Court adjourned the conference until February 26, 2025. At the time, defense counsel believe that there was no need to request an extension of the deadline to submit this letter. However, due to other case commitments and deadlines in the weeks leading up to vacation, I am requesting a 10 day adjournment to submit this letter. Some of these commitments have included setting up depositions in this case, which the parties intend to conduct in early February. This extension will allow the letter to be finalized upon my return. In addition, there is no need to adjourn the conference, as it is set several weeks after this particular deadline. I apologize for the delay in submitting this response.

Defendant thanks the Court for its consideration herein.

Respectfully submitted,

Elissa B. Jacobs /s/

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Cc: **VIA ECF**  
All Counsel of Record